

## CHARGE OF DISCRIMINATION

AGENCY

CHARGE NUMBER

This form is affected by the Privacy Act of 1974; See Privacy Act Statement before completing this form

EEOC 221A10167

and EEOC

State or local Agency, if any

NAME

HOME TELEPHONE

Readnower, Teresa

923-2025

STREET ADDRESS

CITY, STATE, AND ZIP CODE

DATE OF BIRTH

6039 Sheits Road

Cincinnati, OH 45252

7/17/65

NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one list below.)

NAME

NUMBER OF EMPLOYEES, MEMBERS

TELEPHONE

General Ionics

100+

513-794-1010

STREET ADDRESS

CITY, STATE, AND ZIP CODE

COUNTY

10828 Kenwood Road

Cincinnati, OH 45242

Hamilton

NAME

TELEPHONE

STREET ADDRESS

CITY, STATE, AND ZIP CODE

COUNTY

CAUSE OF DISCRIMINATION BASED ON

DATE DISCRIMINATION TOOK PLACE

☐ RACE ☐ COLOR ☒ SEX ☐ RELIGION ☐ NATIONAL ORIGIN

EARLIEST (ADEA/EPA) LATEST (ALL)

☒ RETALIATION ☐ AGE ☐ DISABILITY ☐ OTHER (Specify)

7/12/00

1/18/01

☒ CONTINUING ACTION

THE PARTICULARS ARE (If additional space is needed, attach extra sheet(s)):

I. I am a 35 year old female. I have worked for General Ionics (the "Company") since January, 1992. I most recently held the position of Marketing Supervisor, and I am fully qualified for that position.

II. Mr. Daniel Goins became the General Manager and my direct supervisor in approximately July, 2000. Since that time, he has treated me in a very hostile and harassing manner. I am the only female manager in the office, and the only manager being treated with such disdain and hostility. The other male managers and assistant managers are treated favorably and respectfully by Mr. Goins. I complained about the hostile treatment to David McKinley, who was supposed to investigate the situation but instead reported the entire conversation back to Mr. Goins, who has, in turn, retaliated against me.

III. I believe I have been discriminated against because of my gender in violation of Title VII of the Civil Rights Act, as amended. I believe I have been retaliated against because I complained about the hostile treatment and discrimination.

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I also want this charge filed with the EEOC. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

NOTARY

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

I declare under penalty of perjury that the foregoing is true and correct.

SIGNATURE OF COMPLAINANT

Teresa Readnower

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE

(day, month, and year) 11/24/03

PHYLLIS LEA JONES

Notary Public, State of Ohio

My Commission Expires Jan. 5, 2004

Date

Charging Party (Signature)

STATE OF OHCITY/COUNTY OF Hamilton

CASE NUMBER

221A10167

## AFFIDAVIT

I, Teresa Readnower, being first duly sworn upon my oath affirm and hereby say:

I have been given assurances by an Agent of the U.S. Equal Employment Opportunity Commission that this affidavit will be considered confidential by the United States Government and will not be disclosed as long as the case remains open unless it becomes necessary for the Government to produce the affidavit in a formal proceeding. Upon the closing of this case, the Affidavit may be subject to disclosure in accordance with Agency policy.

I am 35 years of age, my gender is Female and my racial identity is Caucasian.

I reside at 6039 Sheits Road

City of Cincinnati, County of Hamilton

State of OH, Zip Code 45252

My telephone number is 923-2025

My complaint is against General Ionics which is

located at 10828 Kenwood Road

in Cincinnati, OH 45242

My job classification was Marketing Supervisor

My immediate supervisor was Daniel Goins. General Manager

1. Respondent's business:

The Company engages in the business of water conditioning.

2. Personal harm:

Since Daniel Goins has taken over as my manager, I have been treated in a very hostile and harassing manner which has forced me to need to take a medical leave of absence.

3. Respondent's explanation for the alleged harm and its policies and practices:

The company was supposed to commence an investigation into my allegations of hostile treatment, but I do not believe that they have done so.

4. Charging Party's relevant work history:

I have worked for General Ionics since January of 1992, most recently as the Marketing Supervisor. I have reported directly to Mr. Goins since he assumed supervision approximately three months ago. During my

IR  
(initials)

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## AFFIDAVIT (cont.)

employment. I have performed my job responsibilities extremely competently, and my compensation has reflected my favorable job performance as part of my compensation is dependent upon the success of the Marketing Department.

5. Charging Party's rational basis for believing there was discrimination:

I sought the assistance of David McKinley to remedy the extremely hostile working conditions under Danny Goins. He assured me that he would investigate the situation and contact me with a response. Instead, he reported the entire conversation to Mr. Goins. Mr. Goins has since made my work environment exponentially more stressful and difficult. In fact, on October 11, 2000, Mr. Goins dramatically changed my work schedule to Monday through Thursday, 2:00 to 9:00, Friday alternate shift, and every Saturday, 9:00 a.m. to 12:45 p.m. Before October 11, I was never required to work every evening and Saturday, and no other supervisor in my position within the company is required to work those type of hours.

In the memorandum, Mr. Goins also criticized my absences. Most, if not all, of my absences have been directly related to the medical difficulties I am having because of the stress Mr. Goins has placed on me. In fact, Mr. Goins' treatment of me after I was required to undergo a colonoscopy is illuminating. I was scheduled for a colonoscopy on September 14, 2000, and was required to take medication at certain intervals of time to prepare me for the procedure. After one of the treatments, I was going to be required to be at home. Mr. Goins attempted to require me to change my dosing schedule and return to work that afternoon. My physician was extremely upset when I contacted him to request the change in schedule, and directed me not to change my dosing schedule. Mr. Goins also became upset, and on the day of the colonoscopy, contacted me at home and requested that I return to work that night. Mr. Goins' treatment became so harassing that I was forced to contact my physician, Ronald S. Schneider, who faxed a note to Mr. Goins instructing him on my prep instructions for the colonoscopy.

During the past three months that Mr. Goins has been my supervisor, I have suffered extreme emotional distress. Mr. Goins treats me with extreme hostility and disrespect. His treatment is so obvious that many of my co-workers, including many who work closely with Mr. Goins, have commented to me regarding the extremely negative treatment of me that they have witnessed.

I am the only female manager in the office, and the only manager being treated with such disdain and hostility. The other managers and assistant managers, John Malecky, Barry Baley and Brian Huckstep, are treated favorably and respectfully by Mr. Goins. I am the only target of his vitriolic conduct. Also, Mr. Goins had made sexually inappropriate remarks to me during our employment together, before he became my manager. He had made comments about my "butt" and he had invited me to his hotel room while we were at a conference. Also, on one occasion, Mr. Goins called me into his office to show me a Sports Illustrated (Swimsuit Edition) magazine and showed me pictures of several females in swimsuits while he made comments about their body versus my body and he stated "she doesn't have anything on you." Mr. Goins has been the subject of other sexual harassment complaints in the past, and I believe that he may be trying to get rid of me before I would report any concerns about his conduct.

6. Comparator's names, titles, and how similarly situated:

Daniel Goins - General Manager who has treated me in a very hostile and harassing manner.  
John Malecky - a similarly situated supervisor for the Company who was been treated favorably by Mr. Goins.  
Barry Baley - a similarly situated supervisor for the Company who was been treated favorably by Mr. Goins.  
Brian Huckstep - a similarly situated supervisor for the Company who was been treated favorably by Mr. Goins.

7. Witness identification

Amy (LNU)

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(initials)

## AFFIDAVIT (cont.)

(Sales Secretary - sat at front desk - has heard and seen the hostile treatment by Mr. Goins and commented to me about it - will be cooperative)

John Malecky

(Service Mgr. - who was a witness to the hostile treatment - I believe will be truthful)

Barry Baley

(Another employee who was a witness to the hostile treatment and recommended that I seek legal counsel)

Jennifer Ellis

(A co-worker who overheard conversation between Dan & co-worker about how to get rid of me)

## 8. Class harm:

Unknown.

## 9. Remedy:

To be placed in a position for the Company where I would not report to Mr. Goins, emotional distress damages, attorney fees, any and all other relief available under the law.

## 10. Other relevant information:

See attached correspondence to the Company. The request for information may be useful in formulating a request for information to the Company.

I have read and had an opportunity to correct this affidavit consisting of 3 typed pages and swear that these facts are true and correct to the best of my knowledge and belief.

Lurisa Reapbrown

Subscribed and sworn to before me

this 18<sup>th</sup> day of May, 2001.

Phyllis Lea Jones



PHYLLIS LEA JONES  
Notary Public, State of Ohio  
My Commission Expires Jan. 5, 2004

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